HONORABLE LAUREN J. KING 1 2 3 4 5 IN THE UNITED STATES DISTRICT COURT 6 FOR THE WESTERN DISTRICT OF WASHINGTON 7 RENATA MENDENHALL, 8 Case No.: 2:21-CV-00759 LJK Plaintiff, 9 DECLARATION OF AARON I. ENGLE IN SUPPORT OF PLAINTIFF'S REPLY VS. 10 TO DEFENDANT'S OPPOSITION TO RELIANCE STANDARD LIFE INSURANCE PLAINTIFF'S MOTION TO COMPEL 11 COMPANY, a foreign corporation, NOTE ON MOTION CALENDAR: 12 Defendant. **MARCH 4, 2022** 13 1. I am the attorney representing the Plaintiff in this action, Renata Mendenhall. 14 2. I am competent, have personal knowledge of the matters set forth below, and 15 will so testify if called upon to do so. 16 3. While Mr. Torrence is the only attorney to file a notice of appearance on this 17 case, Mr. Joshua Bachrach, a partner in the law firm, has been assisting on this case. The first 18 contact from the Defendant's counsel, was from Mr. Bachrach who informed Plaintiff's counsel 19 by email, dated July 14, 2021, that his firm represents the Defendant and requesting an 20 extension to file an Answer. 21 4. By email, dated July 23, 2021, Mr. Torrence informed Plaintiff's counsel that he 22 would be working with Mr. Bachrach on this matter. 23

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1	5. Most of the claim file consists of Plaintiff's medical records or other documents
2	sent by Plaintiff and her employer, and roughly one third is repeat medical records and reports.
3	6. The internal claims handling documentation only runs from AR0034 to AR0166
4	(132 pages). Attached as Exhibit 1 is the Claim Diary Log Report identifying employees by
5	abbreviation.
6	7. During the discovery conference, when discussing RFPs #8-10, counsel for
7	Reliance indicated that he understood that Plaintiff was requesting claim tracking documents.
8	He indicated that he had seen these before and Reliance typically redacts the names of other
9	claimants. Plaintiff's counsel agreed to review those. None have been produced.
10	I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
11	STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.
12	Executed this 4 th day of March 2022.
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14	/s/ Aaron I. Engle AARON I. ENGLE
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DECLARATION OF AARON I. ENGLE IN SUPPORT OF PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL – 2 File Number: 205022

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